

REMARKS

The Examiner appears to have misunderstood Applicants arguments from Response I, filed March 24, 2005. Accordingly, all of the arguments presented in Response I are incorporated by reference herein, and the following remarks are directed toward correcting the Examiner's statements in the Advisory Action.

For example, in the first paragraph of the Advisory Action, the Examiner asserts that Applicants contended that "the Examiner neglected to respond to arguments provided in [Amendment H]," and that the Examiner's rebuttal was "nonexistent." Neither of these assertions, however, correctly characterize Applicants' arguments from Response I. Applicants never argued that the Examiner failed to provide a rebuttal. Applicants did though, specifically argue that the Examiner has failed to respond to *particular* arguments that have been repeatedly made in several Responses, and based upon particular claim language to which Applicants have repeatedly argued the Examiner has not given full consideration. Applicants maintain that the Examiner has still not fulfilled these requirements, and point to the second paragraph of Advisory Action remarks as support for these contentions.

The Examiner is correct that Applicants have previously argued that the cited Nakajima reference fails to teach "the simultaneous supply of display signals from the signal lines to the data bus lines, and from the data bus lines to the signal lines." The Examiner is entirely incorrect, however, in his assertion that "the claims recite no such language," The

Examiner's decision to once again refuse full consideration of these claims features is inappropriate. In fact, Applicants are at a loss to understand the Examiner's assertion that "the claims recite no such language," given the fact that the Examiner has correctly quoted the applicable language from independent claim 1 that recites "said display signals simultaneously being supplied from and written to the plurality of signal lines to and from the data bus lines respectively." The claim language and the argument language are identical in every substantive and grammatical respect.

Applicants can only assume that the Examiner must be misunderstanding the meaning of the word "respectively" as it appears in claim 1. Merriam Webster's Collegiate Dictionary, 10th Ed., defines the word "respectively" as meaning "*in the order given.*" According to this commonly understood definition, the claim phrase reciting "display signals simultaneously being supplied from and written to the...signal lines to and from the data bus lines respectively" is grammatically and substantively identical to the argument that referred to the simultaneous supply of display signals "from the signal lines to the data bus lines, and from the data bus lines to the signal lines," which is exactly what Applicants have repeatedly argued to the Examiner. The recitation of respective comparative terms is a convenience commonly used in both patent practice, and the English language as a whole. The use of "respective" terminology is not a valid basis on which the Examiner may refuse to give full consideration to clearly recited claim terms.

Applicants' continuing argument therefore, that the Examiner is required to give full consideration to all recited claim limitations, is not merely a "simple disagreement"

with the Examiner's rebuttal, as implied by the Examiner in paragraph 1. The Examiner is required to consider all claim features and limitations, and may not avoid this responsibility by only rebutting some arguments made by Applicants, and examining some of the claimed features and limitations.

Furthermore, the Examiner continues to rely on the same portions from the Nakajima reference without addressing the substance of Applicants' many previous meritorious arguments that traversed the Examiner's reliance on these portions. Again, some key features of the present invention that Applicants have argued are those relating to the simultaneous supply of display signals from the signal lines to the data lines, and to the signal lines from the data lines. In other words, Applicants have argued the novelty of the simultaneous exchange of display signals between the data lines and the signal lines specifically. Not one portion of the Nakajima reference cited by the Examiner teaches or suggests such a simultaneous exchange of display signals between the data lines and the signal lines.

For example, the Examiner again cites only col. 2, lines 33-38, and col. 3, line 64 to col. 6, line 5 of Nakajima as support for somehow teaching these features of the present invention. Neither of these text portions, however, teaches anything of the sort. The portion from col. 2 only teaches a simultaneous *sampling* of video signals by a *driving circuit*, and the concurrent distribution of the sampled video signals to data lines. Nothing in this text portion even suggests any direct transfer of display signals from the data lines to the signal lines, or even that the supply to the data lines is simultaneous with the sampling. By

definition, the concurrent distribution to the data lines could only occur after the signals are sampled, and not simultaneously with the sampling.

Nakajima's disclosure from cols. 3-6 presents the same deficiencies as the text from col. 2. Every reference in this text portion to any action being performed "simultaneously" refers only to the sampling of the video signals (col. 4, lines 23, 31, 42; col. 5, line 34, 38, 49, 58), and not once to any simultaneous exchange of display signals between the data lines and the signal lines. In fact, Nakajima is silent regarding any signals being supplied from the data lines to the signal lines, let alone simultaneously with the supply of such signals from the signal lines to the data lines. The Examiner has not answered these specific arguments, and should not avoid answer by just stating that Applicants "disagree." An adequate rebuttal is not the mere repetition of points already made. To adequately answer Applicants' arguments, according to Section 707.07(f) of the MPEP, the Examiner should first have to address the specific deficiencies in the original points, as traversed by Applicants.

Lastly, with respect to Applicants' previous arguments relating to advantages of the present invention, Applicants remind the Examiner that advantages realized by the present invention over the disclosures of the prior art are "secondary considerations" that the Examiner is required to consider in determining the appropriateness of maintaining an obviousness rejection as a whole. See Graham v. John Deere, 383 U.S. 1, 148 U.S.P.Q. 459 (1966). Such secondary considerations may be presented in rebuttal to a *prima facie* case of obviousness, should one be properly established, and do not need to be specifically recited in

the claim language itself. Such secondary considerations may also overcome the obviousness of the combination of two or more references, without having to address specific features and limitations which may or may not appear among the various references themselves. Whether or not the Examiner agrees that such secondary considerations are sufficient to overcome a *prima facie* case of obviousness, the Examiner is still required give full consideration to such secondary considerations, and may not merely dismiss them as not having “been incorporated into any pending claim language.”

These arguments are not presented as a simple disagreement with the Examiner’s interpretation of existing technology. Instead, these arguments go directly to the issue that the Examiner has not satisfied all of the initial requirements placed upon him to examine all of the claim limitations of the present invention, and to answer meritorious arguments consistently provided throughout the prosecution of this case.

For all of the foregoing reasons, Applicants submit that this Application, including claims 1-21, is still in condition for allowance, which is again respectfully requested. The Examiner is again invited to contact the undersigned attorney if an interview would help expedite prosecution.

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April 28, 2005


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Respectfully submitted,

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